

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ASYLUM SEEKER ADVOCACY  
PROJECT,

Plaintiff,

v.

U.S. CITIZENSHIP AND IMMIGRATION  
SERVICES,

Defendant.

**Case No. 25-cv-02133-ALC**

**DECLARATION OF JOSHUA COLANGELO-BRYAN IN SUPPORT OF  
PLAINTIFF’S MOTION FOR A PRELIMINARY INJUNCTION**

1. I am a member of the bar of New York and of this Court, and Special Counsel at Human Rights First, counsel in this action for Plaintiff Asylum Seeker Advocacy Project (“ASAP”). As such, I am personally familiar with the facts set forth herein.

2. I submit this Declaration in support of ASAP’s Motion for a Preliminary Injunction that orders Defendant U.S. Citizenship and Immigration Services (“USCIS”) to expedite processing of ASAP’s request under the Freedom of Information Act (“FOIA Request”), as set forth in ASAP’s Complaint.

3. The relevant facts regarding the merits of ASAP’s Order to Show Cause are set forth in the accompanying Memorandum of Law and in ASAP’s Complaint.

4. ASAP is moving by an Order to Show Cause and not by a Notice of Motion because ASAP and hundreds of thousands of impacted parolees have suffered, and continue to suffer, irreparable harm as a result of USCIS’s failure to expedite and produce the sole document responsive to ASAP’s FOIA Request.

5. On March 14, 2025, ASAP commenced an action in this Court against Defendant USCIS to enforce its FOIA Request.

6. ASAP served Defendant USCIS, the U.S. Attorney General, and the United States Attorney's Office for the Southern District of New York with the Summons and Complaint for the instant action via certified mail postmarked on March 14, 2025.

7. On behalf of ASAP, I also served Defendant USCIS with the Summons and Complaint for the instant action via electronic mail to the address USCIS provides on its website, [uscis.serviceofprocess@uscis.dhs.gov](mailto:uscis.serviceofprocess@uscis.dhs.gov), on March 14, 2025.

8. On behalf of ASAP, I also served the Chief of the Civil Division for the U.S. Attorney's Office for the Southern District of New York, Jeffrey Oestericher, with the Summons and Complaint for the instant action via electronic mail on March 17, 2025.

9. As of the time of filing on March 17, 2025, counsel for Defendant had not yet entered an appearance in the above-captioned case. Therefore, notice of ASAP's Motion for a Preliminary Injunction, and Order to Show Cause, were sent to the Chief of the Civil Division for the U.S. Attorney's Office for the Southern District of New York, Jeffrey Oestericher, via electronic mail immediately upon filing.

10. ASAP has made no prior application for the relief requested herein.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing Declaration is true and correct.

Dated: March 17, 2025

By: /s/ Joshua Colangelo-Bryan  
Joshua Colangelo-Bryan